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April 30, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW Room TW-A325
Washington, DC 20554

Re: Amending the Definition of Interconnected VoIP Service in Section 9.3 of the Commission's Rules, PS Docket No. 07-114; Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, PS Docket No. 11-153; E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196

Dear Ms. Dortch:

In response to an invitation from FCC staff, on April 26, 2012, John Murdock, President of Bandwidth.com, Ray Paddock, Vice President of Product and Emergency Voice Services, and I met with and presented the attached materials to: Henning Schulzrinne, Patrick Donovan, Aaron Garza, and Dave Siehl, of the Public Safety and Homeland Security Bureau; and William Dever and Richard Hovey of the Wireline Competition Bureau.

During our meeting we discussed Bandwidth.com's real-world experience as both a wholesale and retail provider of VoIP services combined with its role as an emergency services provider to carrier and VoIP provider customers in the context of the Commission's open proceedings concerning emergency calling in a rapidly evolving environment. While Bandwidth.com's view of the magnitude of traffic that may be considered "outbound only VoIP" may be somewhat limited because of issues associated with the disaggregated nature of wholesale traffic routing, it does believe that it is technically capable of supporting 911 call routing for outbound VoIP services irrespective of whether the traffic originates with a North American Numbering Plan telephone number and even in "unsubscribed" or "non-registered" VoIP scenarios if necessary. Bandwidth.com recognizes that there are challenges to providing effective emergency service support when subscriber and/or location information may not be readily available. Nevertheless, Bandwidth.com explained that there are ways in which such information could be captured and delivered to enable emergency services in the near future and as part of the evolution toward Next Generation 911 networks. Additionally, Bandwidth.com provided its perspective on the possible financial considerations that may be associated with expanding the current definition of Interconnected VoIP. Finally, Bandwidth.com briefly discussed its proposed



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clearinghouse capabilities for Text-to-911 traffic including its perspectives on what is technically achievable in the near term and as a component of the evolution to Next Generation 911 networks.

Sincerely,

/s/ Greg Rogers

Greg Rogers

cc: Henning Schulzrinne
Patrick Donovan
Aaron Garza
Dave Siehl
William Dever
Richard Hovey

Attachment